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UNITED STATES BANKRUPTCY COURT
for the
DISTRICT OF NEW JERSEY

In the Matter of

CHAPTER 13

ROBERT R. STRATTON
LAURA L. STRATTON

CASE NO. 18-24081-KCF

**CERTIFICATION OF DEBTOR IN RESPONSE TO TRUSTEE'S
OBJECTION TO CONFIRMATION**

Laura L. Stratton, does hereby certify:

1. I am one of the debtors herein and I make this certification in response to the Standing Chapter 13 Trustee's objection to confirmation of our proposed plan on the basis that I am not paying all my disposable income into the plan due to certain expense items listed in our budget.

2. Our home is 25 years old and accordingly all of the major elements are in need of repair and/or replacement. We need a new roof, dishwasher, washing machine and hot water heater. The central air conditioning unit is the original one, and will need to be replaced before next summer. We also need to replace a damaged ceiling and remediate mold, which resulted from a roof leak. In actuality, our budgeted estimate of home maintenance is probably low since just routine lawn care and other regular maintenance would be over \$200 per month.

3. The utility bills are high because the windows and insulation in the house are not energy efficient and so our heating and cooling costs are high. There is little insulation in the attic and

walls. The attic fan is broken and we have not had the funds to replace it, and that also results in higher cooling costs. Our car insurance is high because we have two teenage drivers. The car lease payment will indeed end as indicated but it will be replaced with another.

4. We have filed a Pre-Confirmation Certification.

5. Our tax refund is not in the budget because it was setoff against tax liability, which continues.

6. Lastly, we are investigating the State of NJ Division of Taxation claim for employer disability/unemployment taxes from 1999 - 2006. We will file an objection or resolve the claim after researching the liability.

7. For the foregoing reasons, I respectfully request this Honorable Court to deny the trustee's objection and confirm our plan as proposed.

I hereby certify that the foregoing statements made by me are true to the best of my knowledge, information and belief. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.

Dated: August 24, 2018

/s/ Laura L. Stratton